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February 20, 2012

Via ECF

Hon Brian M. Cogan, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**RE: *Katz v. Century 21 Department Stores, LLC*, No. 12 Civ. 0244 (SJ) (MDG);
Torreblanca v. Century 21 Department Stores, LLC, No. 12 Civ. 0246 (BMC)**

Dear Judge Cogan:

We represent Defendant Century 21 Department Stores, LLC in the above-referenced actions. Pursuant to Local Civil Rule 1.6, we write to suggest that *Torreblanca*, which is assigned to Your Honor, be reassigned to Judge Johnson as a related case to *Katz*. These two purported class actions, initially filed on the same day, allege essentially identical violations by the same defendant of the same federal statute. The putative classes in the two actions are nearly identical, and the two complaints seek essentially the same damages. No responsive motion or pleading has yet been filed, and no discovery has yet occurred, in either case.

Last week, we moved before the Judicial Panel on Multidistrict Litigation to have these two cases, and three other actions currently pending in other districts, consolidated for pretrial purposes before Judge Robert W. Sweet in the Southern District of New York. Should the Court want copies of our motion papers, we would be happy to provide them.

We appreciate Your Honor's consideration.

Very truly yours,



Evan K. Farber

Cc: Hon. Sterling Johnson, Jr., U.S.D.J.
Hon. Marilyn D. Go, U.S.M.J.
All counsel of record